

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: <b>PARMINDER KAUR,</b>	:	<b>Chapter 13</b>
Debtor(s),	:	Case No. <b>5:22-bk-02052-MJC</b>
<b>TOYOTA MOTOR CREDIT CORPORATION,</b>	:	
Movant,	:	<b>Motion for</b>
v.	:	<b>Relief from Stay</b>
<b>PARMINDER KAUR and</b>	:	
<b>JACK ZAHAROPOULOS, TRUSTEE,</b>	:	
Respondent(s),	:	

**ANSWER TO MOTION OF TOYOTA FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **PARMINDER KAUR**, by and through their attorneys, J.

**ZAC CHRISTMAN, ESQUIRE**, and in Answer to the Motion of **TOYOTA** for Relief from Stay

aver(s):

1-2. Admitted.

3. Denied to the extent the averments of paragraph 3 constitute other than a statement or conclusion of law or misplaced request for relief.

4. Admitted.

5-6. Denied to the extent the document(s) referenced do not speak for themselves.

7. Denied. Movant has failed to credit payments paid via Wells Fargo Billpay on December 30, 2022, in the amount of \$450 and on January 24, 2023, in the amount of \$500. Additionally, Debtor made payment of \$450 on March 24, 2023. Movant's customer service agents are reviewing the account to determine whether the uncredited payments were returned to her or misapplied, and Debtor has funds available to pay any amounts that might have been returned to her.

8. Denied. See response to paragraph 7, above.

9. Admitted in part and Denied in part. While Debtor does not believe the vehicle has a value of \$21,775, Debtor asserts that there is nonetheless sufficient equity cushion in the 2017 Toyota RAV4 to have provided adequate protection even if Movant's allegations were correct.

10. Admitted.

11. Denied. Debtor has paid amounts sufficient to provide Movant with adequate protection. An equity cushion of roughly twice the amount of the alleged amount due independently provides adequate protection.

WHEREFORE, Debtor(s) **PARMINDER KAUR** respectfully pray(s) this Honorable Court for an Order than the Motion of **TOYOTA** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,  
FISHER & CHRISTMAN

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